

December 29, 2021

The Honorable Jocelyn G. Boyd
Chief Clerk/Executive Director
Public Service Commission of South Carolina
101 Executive Center Drive, Suite 100
Columbia, SC 29210

Via SCPSC E-FILING DMS

**Re: Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC
to Request the Commission to Hold a Joint Hearing with the North Carolina
Utilities Commission to Develop Carbon Plan;
Docket No. 2021-349-E**

Dear Ms. Boyd:

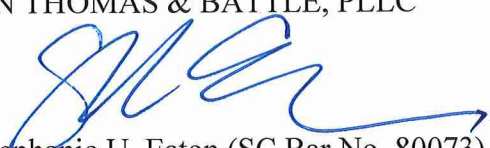
Please find attached for electronic filing with the South Carolina Public Service Commission ("Commission") a copy of the Petition to Intervene of Walmart Inc. ("Walmart"), in the above-referenced case. By copy of this letter, I am serving all parties of record via Electronic Mail.

Please contact us if you have any questions concerning this filing.

Sincerely,

SPILMAN THOMAS & BATTLE, PLLC

By


Stephanie U. Eaton (SC Bar No. 80073)

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Counsel to Walmart Inc.

SUE/sds
Attachments
c: Certificate of Service

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-349-E

IN RE:)	CERTIFICATE OF SERVICE
)	
Joint Petition of Duke Energy Carolinas, LLC)	
and Duke Energy Progress, LLC to Request the)	
Commission to Hold a Joint Hearing with the)	
North Carolina Utilities Commission to)	
Develop Carbon Plan)	

I hereby certify that I have this day served one (1) copy of the foregoing document upon the following parties to this proceeding via Electronic Mail:

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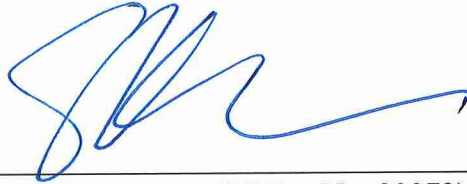
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Stephanie U. Eaton (SC Bar No. 80073)

Dated: December 29, 2021

BEFORE THE
PUBLIC SERVICE COMMISSION
OF SOUTH CAROLINA
DOCKET NO. 2021-349-E

IN RE: Joint Petition of Duke Energy Carolinas, LLC and Duke Energy Progress, LLC to Request the Commission to Hold a Joint Hearing with the North Carolina Utilities Commission to Develop Carbon Plan)))))	PETITION TO INTERVENE OF WALMART INC.
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Pursuant to Rule 103-825 and other applicable rules and regulations of the South Carolina Public Service Commission ("Commission"), Walmart Inc. ("Walmart"), by its attorneys, respectfully requests that the Commission permit it to intervene and become a party in the above-captioned matter. In support of its Petition to Intervene, Walmart submits as follows:

1. On November 9, 2021, Duke Energy Carolinas, LLC ("DEC"), and Duke Energy Progress, LLC ("DEP") (collectively, "Companies") filed a Joint Petition with this Commission requesting that it conduct a joint hearing with the North Carolina Utilities Commission ("NCUC") to develop a carbon plan consistent with the carbon reduction goals of N.C. Gen. Stat. §§ 62-2, 62-30, 62-48, 62-110.1(c), Part I of Session Law 2021-165 ("HB 951") ("Petition").

2. Walmart is a global retailer of goods and services that operates throughout the United States. Walmart's principal energy management office is located at 2608 SE J Street, Bentonville, AR 72716.

3. Walmart has the privilege of providing its retail services throughout the State of South Carolina, operating 126 facilities, including 83 Supercenters, four Distribution Centers, 26 Neighborhood Markets, and 13 Sam's Clubs.¹ Walmart is a large commercial customer of the

¹ <https://corporate.walmart.com/our-story/our-locations#/united-states/south-carolina>

Companies in South Carolina, purchasing over 98 million kWh annually from DEC and approximately 34 million kWh annually from DEP. Electricity is one of the largest operating costs faced by Walmart. As a result, any modification to the Companies' electric rates and terms of service may substantially impact Walmart's operations. Moreover, Walmart has established aggressive and significant renewable energy goals.² The Companies' efforts to develop a carbon plan not only affects Walmart's operations in North Carolina and South Carolina, but also its renewable energy goals.

4. Walmart has substantial experience with renewable energy and experience in other jurisdictions that have implemented carbon free programs (i.e., Virginia's Clean Economy Act, which seeks to bring Virginia to a carbon free economy by 2050) that it would bring to bear in this proceeding to assist the Commission's analysis and consideration of the Companies' Petition.

5. Walmart has sought intervention in the companion proceeding presently pending before the NCUC, Docket Nos. E-2, Sub 1283 and E-7, Sub 1259.

6. Based on the foregoing, Walmart has a direct and substantial interest in the outcome of this proceeding. As a large commercial customer that purchases substantial amounts of electricity and related services from the Companies pursuant to multiple accounts at multiple locations, Walmart has an interest in this proceeding that is not represented by any other party.

7. The attorneys representing Walmart in this proceeding are:

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² See <https://corporate.walmart.com/newsroom/2020/09/21/walmart-sets-goal-to-become-a-regenerative-company>

Ms. Eaton is authorized to accept service on behalf of Walmart. Walmart also respectfully requests that Ms. Grundmann and Mr. Williamson be added to the service list as Walmart may seek Ms. Grundmann's and/or Mr. Williamson's admission to appear before the Commission *pro hac vice* in the near future.

8. This Petition to Intervene is timely filed as interventions are due by December 31, 2021, per Notice of the Commission.

WHEREFORE, Walmart Inc., respectfully requests that it be granted leave to intervene and be made a party to the above-captioned proceeding.

Respectfully submitted,

SPILMAN THOMAS & BATTLE, PLLC

By 

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Dated: December 29, 2021